Law Offices Of Donna R. Newman Attorney at Law 20 Vesey Street, Suite 400 New York, New York 10007 Tel. 212-229-1516 Fax 212-593-1844

donnanewmanlaw@aol.com Admitted: N.Y. & N.J. Bar

USDC SDNY **DOCUMENT ELECTRONICALLY FILED** DOC #: 6/9/2025 DATE FILED:

June 6, k2025

## **BY ELECTRONIC MAIL & ECF**

The Honorable Victor Marrero United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v Villafane, Juan Kuang 21 cr 93 (VM)

Dear Judge Marrero:

Request GRANTED. Defendant Juan Kuang's conditions of pretrial release are amended so as to permit him to travel to New Jersey for the purposes specified. SO ORDERED. 6/9/2025 DATE

Please allow this letter as a motion to amend Juan Kuang's conditions of pretrial release to expand his permitted travel to include New Jersey. His pretrial services officer, Officer Akil King and the Government consent to this requested amendment to Mr. Kuang's conditions of pretrial release.

The Court on April 22, 2025 (ECF # 374) granted Mr. Kunag's application to amend his conditions of pretrial release to permit him to travel throughout New York State so that he can visit with his elderly grandparents and his father and stepmother who live upstate New York. The bus that he would take for the trip Upstate New York, travels through a portion of New Jesey on its way Upstate New York. Accordingly, Mr. Kuang seeks permission to travel to New Jersey to avoid violating the terms of his release when he travels by bus to visit with family members Upstate New York.

Respectfully submitted, /s/Donna R. Newman Cc: AUSA Michael Herman PTSO Akil King via email Juan Kuang via email